

# PRIVACY POLICY:

## [www.flighttrainingalliance.com](https://www.flighttrainingalliance.com)

### 1. Controller

We, Flight Training Alliance GmbH (hereinafter also referred to as “FTA GmbH” or “we”, or “us”), would like to provide you with information on how we process your personal data when you use our website <https://www.flighttrainingalliance.com>

Should you have any further questions regarding data protection in connection with our website or the services offered on it, please contact you can send an e-mail to [admin@flightta.com](mailto:admin@flightta.com) and we will address your enquiries together with our **data protection officer**:

Lufthansa Group Data Protection Officer  
Dr. Barbara Kirchberg-Lennartz  
Deutsche Lufthansa AG  
FRA RD  
60546 Frankfurt  
E-mail: [dsb@dlh.com](mailto:dsb@dlh.com)

### 2. Scope, Purpose, and lawful Basis of processing personal Data

We collect and use personal information directly from our users or from other sources (as described below) in the following situations:

#### 2.1. Use of the Website and Creation of Log Files

When users visit our website, our system automatically collects data and information about the computer accessing our website each time our website is accessed. In the process, the following data (“technical information”) is collected:

- (1) Information about the type and version of browser used
- (2) The user’s operating system
- (3) The user’s internet service provider
- (4) The user’s IP address
- (5) The date and time the website was accessed
- (6) Websites from which the user accessed our website
- (7) Websites and files that were accessed by the user’s system from our website, as well the following information: the method of access and protocol
- (8) The size of the file/page accessed

This data is also saved in our system’s log files. This data is not stored together with any other personal data about the user.

We collect and use this technical information for purposes of (network) security (e.g. to combat cyberattacks), marketing, and to better understand the requirements of our users, as well as to continuously improve our website and enable the respective user to access the website from their computer.

This information is stored in log files to guarantee the website's functionality. In addition, we use the data to optimize our website and to ensure the security of our information technology systems. We do not process the data collected in this context for marketing purposes.

The lawful basis for the temporary storage of data and log files is article 6(1)(f) of the GDPR.

## 2.1.1. Use of Cookies

Our website uses cookies. Cookies are text files that are saved in the user's web browser or by the user's web browser on their computer system. If a user visits a website, a cookie may be stored on the user's operating system. This cookie contains a unique string of characters that uniquely identifies the user's browser when the user returns to the website.

Cookies are stored on the user's computer and transmitted to our site. As a result, you as the user also have full control over the use of cookies. You can deactivate or restrict the use of cookies by changing the settings in your web browser. Any cookies that have already been saved can be deleted at any time. This can also be carried out automatically. Please note that if you deactivate cookies for our website, you may no longer be able to fully use all of our website's features.

The following cookies are used on our website:

### First Party Cookies

PHPSESSID: Session cookie for PHP

be\_typo\_user: Session cookie for Log into TYPO3-Backend (only for Backend User relevant)

fe\_typo\_user: Session cookie from TYPO3 for Frontend users (e.g. Captcha-Validation)

### Third Party Cookies

When a Vimeo video is included, cookies are created by vimeo.com and player.vimeo.com. Further information about the cookies can be found under: Cookies Policy Vimeo [https://vimeo.com/cookie\\_policy](https://vimeo.com/cookie_policy)

## 2.2. Use of the Services offered on our Website

We offer a wide range of services on our website. In order to provide these services, we must collect and process personal data from users or our customers.

### 2.2.1. Use Case

When contacting FTA GmbH we process your personal data (including name and email address in order to be able to provide you with relevant information about our training products, to submit an offer, to fulfill the contract (Article 6 (1) (b) GDPR) and to safeguard our legitimate interests (Art. 6 para 1 lit. f DSGVO), as well as for purposes of fraud detection, audit, collection, security and marketing.

## 2.3. Processing personal Data on the Basis of our legitimate Interests

In the event that article 6(1)(f) of the GDPR is our legal basis for processing, in addition to the purposes listed above, our legitimate interests include:

- Protecting the company from material or immaterial damage
- Professionalization (of our products and services)
- Cost optimization (cost control and cost minimization)

## 2.4. Further Obligations to process Data

Insofar as we are legally obligated to do so, we also process personal data in order to comply with our obligation to retain data as set forth in applicable commercial or tax law or to meet security requirements (e.g. section 7 of the Luftsicherheitsgesetz (LuftSiG), German aviation security act). Further information about retention periods can be found under Duration of Data Processing.

## 2.5. Obligation to provide personal Data

In order to meet statutory or contractual requirements, we have marked the respective fields in the forms on our website that must be filled out so that we can perform the requested contract or service.

## 3. Duration of Data Processing

Your personal data will be erased as soon as it is no longer required for the aforementioned purposes. In this context, personal data may be stored for the period of time during which legal claims can be asserted against FTA GmbH (statutory limitation period of three to thirty years). In addition, personal data is stored to the extent and for as long as FTA GmbH has a legal obligation to do so. Corresponding documentation and retention obligations result from Germany's Commercial Code, tax code, and money-laundering act, among others. Based on the aforementioned laws, data can be stored for a period of up to 10 years.

## 4. Right to object pursuant to Article 21 of the GDPR

You have the right to object, at any time, on grounds relating to your particular situation, to the processing of personal data concerning you, which is based on point (e) or (f) of article 6(1) of the GDPR, including profiling based on those provisions.

If you make such an objection, the controller will no longer process your personal data unless the controller can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims.

Where personal data is processed for direct marketing purposes, you have the right to object, at any time, to the processing of your personal data for the purpose of such marketing; this also applies to profiling insofar as it is conducted in conjunction with such direct marketing.

If you object to the processing of your personal data for direct marketing purposes, we will cease to process your personal data for this purpose.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

## 5. Disclosure of personal Data to Third Parties

In order to be able to offer you our products and services based on our contractual obligations or in accordance with our legitimate interests, we may have to disclose your personal data to third parties within or outside the FTA GmbH. These recipients can be categorized as follows:

- **Service Providers**
  - In connection with the delivery of the training services (including Lufthansa Aviation Training GmbH, CAE Inc. and Bombardier Inc. and their Affiliates)

- In connection with invoicing, tax consulting and auditing (including Kieger GmbH, PricewaterhouseCoopers GmbH Wirtschaftsprüfungsgesellschaft)
- **Government agencies and authorities**

In this context, personal data may be transferred to third countries or international organizations. For your protection and the protection of your personal data, such data transfers are subject to appropriate safeguards pursuant to and in accordance with the applicable legal requirements (in particular application of EU standard contractual clauses) or an adequacy decision adopted by the EU Commission (article 45 of the GDPR).

Information about EU standard contractual clauses can be found at:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:039:0005:0018:EN:PDF>

The EU Commission provides information on its adequacy decisions at: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en#dataprotectionincountriesoutsidetheeu](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en#dataprotectionincountriesoutsidetheeu)

You can also request a copy of the security measures we implement by sending an e-mail to [admin@flightta.com](mailto:admin@flightta.com) copying [dsb@dlh.com](mailto:dsb@dlh.com).

In addition, we are legally obligated to disclose personal data to German and international authorities pursuant to article 6(1)(c) of the GDPR in conjunction with local and international regulations and agreements.

## 6. Rights of the Data Subject

Ensuring our processing operations are fair and transparent is extremely important to FTA GmbH. For this reason, it is important to us that you, as the data subject, can exercise the following rights, in addition to the right of objection, if the respective legal requirements are met:

- Right of access pursuant to article 15 of the GDPR
- Right to rectification pursuant to article 16 of the GDPR
- Right to erasure ("right to be forgotten") pursuant to article 17 of the GDPR
- Right to restriction of processing pursuant to article 18 of the GDPR
- Right to data portability pursuant to article 20 of the GDPR

To exercise your rights, simply send an e-mail to [admin@flightta.com](mailto:admin@flightta.com). In this case, we would like to point out that in order to process your request and to identify you, we will process your personal data in accordance with article 6(1)(c) of the GDPR.

In addition, you have the right to lodge a complaint with a supervisory authority. The supervisory authority responsible for Flight Training Alliance GmbH is:

Behörden Hessischer Datenschutzbeauftragter  
Postfach 3163  
65021 Wiesbaden  
[Poststelle@datenschutz.hessen.de](mailto:Poststelle@datenschutz.hessen.de)

## 7. Consent

If you have given us your consent to process your personal data, we hereby inform you that you have the right to withdraw this consent at any time.

If you have given your consent on this website, please visit the page where you originally gave your consent to withdraw your consent in the settings.

In all other cases or if you have any difficulties withdrawing your consent on this website, you can send an e-mail to [admin@flightta.com](mailto:admin@flightta.com).

Please note that the withdrawal of consent only applies to the future and does not affect the lawfulness of processing based on consent before its withdrawal. In certain cases, we may be authorized to continue processing your personal data on another legal basis – such as to fulfil a contract – despite your withdrawal.

## 8. Disclaimer and Limits of this Privacy Policy

The information regarding data protection provided in this Privacy Policy only applies to the processing of data on the website: [www.flighttrainingalliance.com](http://www.flighttrainingalliance.com). Other websites are not covered by this Privacy Policy and provide their own specific privacy policy.